

November 21, 2002

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Office of Special Nutritionals (HFS-450) Center for Food Safety and Applied Nutrition U.S. Food and Drug Administration 5100 Paint Branch Parkway College Park, MD 20740-3835

DEC 0 4 2002

RE:

Label Claims/Disclaimers

Dear Sir/Madam:

This letter is to notify you that Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
Enzymatic Therapy, Inc.	Panax Ginseng Phytosome™	Korean Ginseng (Panax ginseng) Root Phytosome™	Dramatically improved absorption – research indicates Phytosomes may be absorbed 3 to 7 times more effectively than non-Phytosome products.*

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

Bri Kildlilli

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 1/2/102

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

Michael P. Devereux Chief Financial Officer 975 0162

LET /1255

825 Challenger Drive Green Bay, WI 54311-8328

Ph: 920-469-1313

Fax: 888-570-6460

www.enzy.com

Panax Ginseng Phytosome 3e

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November 24, 2002

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

DEC 0 4 2002

RE:

Label Claims/Disclaimers

Dear Sir/Madam:

This letter is to notify you that Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

COMPANY	PRODUCT NAME	<u>DIETARY</u> <u>INGREDIENTS</u>	STATEMENTS
Enzymatic Therapy, Inc.	Panax Ginseng Phytosome™	Korean Ginseng (Panax ginseng) Root Phytosome™	With a non-Phytosome, fewer molecules of the herbal compound penetrate and are absorbed by the membrane of the intestinal wall, where most of the body's nutrients are absorbed.*

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By:

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date:

11/24/02

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely

825 Challenger Drive Green Bay, WI 54311-8328

Ph: 920-469-1313

Fax: 888-570-6460

www.enzv.com

Michael P. Devereux Chief Financial Officer

Panax Ginseng Phytosome 6e



November 23, 2002

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

RE:

Label Claims/Disclaimers

Dear Sir/Madam:

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COMPANY	PRODUCT NAME	<u>DIETARY</u> INGREDIENTS	STATEMENTS
Enzymatic Therapy, Inc.	Panax Ginseng Phytosome™	Korean Ginseng (Panax ginseng) Root Phytosome™	Enhanced delivery – more of the herbal molecules get where they're needed most, to the cells in your body.*

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

or: Kalalil

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11/23/02

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely

Michael P. Devereux Chief Financial Officer

Ph: 920-469-1313

825 Challenger Drive

Green Bay, WI 54311-8328

Fax: 888-570-6460

www.enzy.com

Panax Ginseng Phytosome 5e



November 20, 2002

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

DEC 0 4 2002

RE:

Label Claims/Disclaimers

Dear Sir/Madam:

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COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	<u>STATEMENTS</u>
Enzymatic Therapy, Inc.	Panax Ginseng Phytosome™	Korean Ginseng (Panax ginseng) Root Phytosome™	Phytosomes™ are advanced forms of herbal products that are better absorbed, utilized, and as a result produce better results than conventional herbal extracts.*

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: KIRCHE

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11/20/02

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

825 Challenger Drive Green Bay, WI 54311-8328

Ph: 920-469-1313

Fax: 888-570-6460

www.enzy.com

Michael P. Devereux Chief Financial Officer

Panax Ginseng Phytosome 2e



November 25, 2002

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

DEC 0 4 2002

RE: Label Claims/Disclaimers

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COMPANY	PRODUCT NAME	<u>DIETARY</u> INGREDIENTS	<u>STATEMENTS</u>
Enzymatic Therapy, Inc.	Panax Ginseng Phytosome™	Korean Ginseng (Panax ginseng) Root Phytosome™	When the herbal compound is combined with phosphatidylcholine, the result is a new Phytosome molecule, which is more rapidly and more efficiently absorbed.*

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: KILLIL

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11/25/02

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

Michael P. Devereux

Chief Financial Officer

Ph: 920-469-1313 Fax: 888-570-6460

825 Challenger Drive Green Bay, WI 54311-8328

www.enzy.com

Panax Ginseng Phytosome 7e



November 22, 2002

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

DEC 0 4 2002

RE:

Label Claims/Disclaimers

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COMPANY	PRODUCT NAME	INGREDIENTS	STATEMENTS
Enzymatic Therapy, Inc.		Korean Ginseng (Panax ginseng) Root Phytosome™	Increased biological activity – the health-supporting properties of the herb last longer in your body.*
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I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

Bv:

Cobert C. Doster

Title: Senior Vice President of Scientific Affairs

Date

11/22/02

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

Michael P. Devereux

Chief Financial Officer

Ph: 920-469-1313

Fax: 888-570-6460

825 Challenger Drive

Green Bay, WI 54311-8328

www.enzy.com

Panax Ginseng Phytosome 4e